



Richard T. Ellis
Director – Federal Affairs

1300 I Street, NW
Suite 400 West
Washington, DC 20005
(202) 515-2534
(202) 336-7866 (fax)

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Ex Parte

William Caton
Acting Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Application by Verizon New England for Authorization To Provide In-Region,
InterLATA Services in Vermont, CC Docket No. 02-7

Dear Mr. Caton:

This letter responds to staff's request for additional information on certain operational support system (OSS) areas discussed in Verizon's application.

LMU Response Times: As noted in the McLean/Wierzbicki Declaration (paragraph 42), there were no Loop Make-up (LMU) transactions in Vermont in November or December. There were also no LMU transactions in Vermont in January. In Massachusetts, there were six LMU transactions using the Web GUI in November, and six LMU transactions using the Web GUI in December. Although Verizon is not subject to any performance measures concerning this transaction, Verizon performed a special study to determine average response times in November, December, and January in Massachusetts. The average response time for the November transactions in Massachusetts was 18.3 seconds; the average response time for the December transactions in Massachusetts was 23.7 seconds. There were no LMU transactions using the EDI or CORBA interfaces in Massachusetts in either November or December. In January, there were 43 LMU transactions in Massachusetts, all using the Web GUI. The average response time in January for these transactions was 9.9 seconds.

Order Confirmation Timeliness Measure: Staff asked for further information about the "system queuing problems" discussed in the McLean/Wierzbicki Declaration (paragraph 69) that affected performance under OR-1-02-3143 (% on time LSRC – flow through – UNE-P). As explained

there, there were very low volumes – only 15 observations – for this measure in November. The two PONs that missed the benchmark were affected by different issues.

First, on November 13, 2001, three CLECs were having problems on their side of the EDI interface that caused them to be unable to receive EDI files from Verizon. This caused a back-up on Verizon's side of the EDI interface for notifiers going out to CLECs. As soon as Verizon identified the problem, the files for these three CLECs were moved to another directory until their systems were ready to receive the transmissions. By moving these files out of the way, files in queue behind them were able to be sent. As a regular course of business, Verizon monitors the systems to detect anomalies such as the one that occurred here. When they are found, the cause is identified and addressed. The Vermont PON that missed the 2-hour benchmark for this reason was returned in 3 hours and 1 minute.

Second, the weekend of November 17-18 was a system release weekend when certain systems were off-line for system upgrades for a period of time that extended beyond the exception period provided for in the Carrier-to-Carrier Guidelines. While the systems were off-line, all transactions queued up until the systems came back on line, at which time the transactions in the queue were processed. The extended off-line period occurred on a Sunday afternoon. The Vermont PON that missed the 2-hour benchmark for this reason was returned in 5 hours and 44 minutes.

PCN/BCN Timeliness Measures: As explained in the Guerard/Canny/Abesamis Declaration ¶¶ 20, 41, effective with the November performance month, the New York Carrier-to-Carrier Guidelines, which are also applicable to Vermont, eliminated metrics OR-4-02-2000 and -3000, and OR-4-05-2000, and -3000. As a result, these metrics were not reported after October 2001. Verizon plans to begin reporting the new metrics (OR-4-11, OR-4-16, and OR-4-17) with the March data month, as a result of the systems work required to capture the information ordered by the New York Public Service Commission.

Verizon has performed a special study of its performance in Vermont under the discontinued metrics OR-4-02 and OR-4-05 for November and December. As shown in Attachment A, Verizon met the 95% benchmark for UNE orders in November and December. Verizon's performance on resale orders in November and, to a lesser extent, in December, was affected by a one-time clean-up activity undertaken in association with the retirement of LSOG 2. In conjunction with that retirement, Verizon initiated a review of LSOG 2 pipeline orders (*i.e.*, orders still being processed) to ensure that all such orders were identified, and that their status was communicated to the CLECs that had submitted the orders. As part of ongoing internal quality reviews, Verizon also decided to include LSOG 4 orders in this review. In the course of this review, Verizon uncovered some orders that had been completed, but for which the chain of notifiers – Acknowledgement, Confirmation, Provisioning Completion, and Billing Completion – was incomplete. When the affected orders were identified, completion notifiers for these orders were created for the CLECs. Performance measure OR-4-02 (like a number of other measures in the Carrier-to-Carrier reports) is a “backward looking” measure. That is, it counts notifiers in the month when they are sent, then looks back to see whether the beginning event (in this case, completion in the billing system) occurred within the specified time. If it did not, as was the case for these clean-up notifiers sent in November and December, the notifiers were

scored as performance standard "misses" in the month in which the notifiers were sent (not in the months when the work was completed).

The twenty-page limit does not apply as set forth in DA 02-111. Please let me know if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard Telli".

cc: J. Veach
J. Stanley
G. Remondino

Special Study - Vermont OR-4-02 and OR-4-05 November and December 2001(metrics have been retired)

Metric	Standard	Nov-01			Dec-01		
		Metric %	Total Obs.	# Late PONs	Metric %	Total Obs.	# Late PONs
OR-4-02 - Completion Notices % On Time (BCN)	95% by noon next business day						
RESALE		88.23%	382	45	94.35%	637	36
UNE		95.08%	183	9	95.48%	177	8
OR-4-05 - Work Completion Notices % On Time (PCN)	95% by noon next business day						
RESALE		100.00%	391	0	100.00%	638	0
UNE		100.00%	171	0	100.00%	174	0